



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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June 17, 2016

BY E.C.F.

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Nurun Happy, as M/N/G of R.R. v. City of New York, et al.
15 CV 6232 (JBW) (RML)

Your Honor:

I represent the defendants in the above-referenced case. Defendants write to respectfully request, with the consent of plaintiff's counsel, Baree Fett, Esq., a brief two week enlargement of time, from June 17, 2016 until July 1, 2016, for defendants Gonzalez and Rosso to answer or otherwise respond to the complaint. No previous request for an extension for these defendants has been made.

This request is made because defendants have advised plaintiff counsel that they intend to move to dismiss certain defendants from this case. As one of plaintiff's attorneys, Gabe Harvis, is currently out of town, the parties agreed that an enlargement of time for the remaining defendants to respond to the complaint was appropriate, so that plaintiff's counsel, Gabe Harvis, an opportunity to decide whether he wished to amend the complaint before defendants file their motion.

Accordingly, for the reasons stated herein, defendants respectfully request until July 1, 2016 for defendants Rosso and Gonzalez to respond to the complaint.

I thank the Court for its time and consideration in this regard.

Respectfully submitted,

/s

Matthew W. McQueen
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Gabriel Harvis, Esq. (by E.C.F.)
Attorney for Plaintiff